

## Meyer, Linda

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**From:** Meyer, Linda  
**Sent:** Friday, September 05, 2014 10:13 AM  
**To:** Weigel, Greg  
**Subject:** RE: RCRA Pond UAO Weekly Reports #212 - August 25 - August 31, 2014 & Monthly Report August data

Greg – thanks for the update. I am going to be in the field next Tuesday so will not be able to make the call. I am planning on a FMC site visit on the 25/26<sup>th</sup> – so I hope that works for you. I have a number of files to still go through but we should talk before the site visit. Next week, Sept 12 is good; Week of 9/15, Monday is good, Sept 16/17 not good 18<sup>th</sup> and 19<sup>th</sup> are good. An hour? Let me know if you have time and what works best. Thanks!

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**From:** Weigel, Greg  
**Sent:** Friday, September 05, 2014 10:00 AM  
**To:** Kelly Wright; [susanh@ida.net](mailto:susanh@ida.net); [brian.english@deg.idaho.gov](mailto:brian.english@deg.idaho.gov); Meyer, Linda  
**Subject:** FW: RCRA Pond UAO Weekly Reports #212 - August 25 - August 31, 2014 & Monthly Report August data

Note that Barbara included a 2013 Emission Estimation attachment. Also note that, based on concentration trends, I gave approval this week to add two GES units at Pond 15S (an additional unit at SW standpipe making for 6 total, and another unit at E standpipe, making 2 total). I also approved reducing GES run time (1 unit) at Pond 8A from 12 hours per day to 6 hours per day, in order to try to level the concentration trend and not have to eventually shut the unit down.

Monthly telecom next Tuesday at 10:00 am.

Greg Weigel  
Federal On-Scene Coordinator  
EPA Region 10, Emergency Response Unit  
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**From:** Barbara Ritchie [<mailto:BARBARA.RITCHIE@fmc.com>]  
**Sent:** Thursday, September 04, 2014 2:51 PM  
**To:** Weigel, Greg  
**Cc:** Hastings, Janis; Smith, Andy; 'Kelly Wright'; [susanh@ida.net](mailto:susanh@ida.net); Rob Hartman; [brian.english@deg.idaho.gov](mailto:brian.english@deg.idaho.gov); Al Lam; Mark Smith; Marc Bowman; [vannoyj@dhw.idaho.gov](mailto:vannoyj@dhw.idaho.gov); Paden, Norka E - CO 6th; Brian McGinnis; Williams, Jonathan; Meyer, Linda  
**Subject:** RCRA Pond UAO Weekly Reports #212 - August 25 - August 31, 2014 & Monthly Report August data

Greg,

As you had directed, FMC is providing a weekly / monthly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

### **WEEKLY**

#### **Work Performed this week:**

- Continued implementation of the RIWP and 12/7 operation of one GES unit at the east perimeter standpipe on Pond 18A.
- Continued implementation of gas extraction at Pond 15S, consistent with the Pond 15S RIWP submitted on 6/10/14, on a 12/7 schedule using five GES units extracting at the southwest standpipe and one GES unit extracting from the east standpipe at Pond 15S.
- Continued continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- Other than continuous monitoring at Ponds 15S and 18A, no monitoring was performed or required pursuant to the approved work plans during the reporting period.
- Continued compilation of monitoring data for submittal in this monthly report.
- Compiled 2013 monitoring data for calculation of annual PH3 emissions in response to request from the Tribes.

#### **Problems Encountered:**

None.

#### **Unplanned Events Encountered:**

None.

#### **Work to be performed the following week:**

- Continue implementation of the IWP and 12/7 operation of one GES unit at the east perimeter standpipe on Pond 18A. Comparison of July and August monthly average PH3 source gas concentrations shows a decreasing trend below 10,000 ppm and consistent with the IWP, mass removal will be decreased by reducing the operating hours to a 6/7 schedule for the one GES deployed at Pond 18A.
- Continue implementation of gas extraction at Pond 15S, consistent with the Pond 15S RIWP submitted on 6/10/14, on a 12/7 schedule using five GES units extracting at the southwest standpipe and one GES unit extracting from the east standpipe at Pond 15S. Comparison of July and August monthly average PH3 source gas concentrations shows an increasing trend above 10,000 ppm (likely due to the addition of a fifth GES unit at the southwest standpipe on 8/9/14 creating a deeper zone of extraction within the pond) and consistent with the IWP, mass removal will be increased by deploying a sixth GES unit at the southwest standpipe and a second GES unit at the east standpipe. All eight GESs will operate on a 12/7 schedule.
- In addition to continuous monitoring at Ponds 15S and 18A, monitoring performed pursuant to the approved work plans during this week:
  - Pond 16S - Appurtenance monitoring and perimeter surface scan (weather / surface conditions permitting)

- Pond 18A – Appurtenance monitoring and perimeter surface scan (weather / surface conditions permitting)
- Submit compiled August monitoring data in this monthly report, to be reviewed in a conference call scheduled for 9/9/14 at 9A PDT/10A MDT/noon EDT.
- Provide 2013 PH3 emissions rate of 2.61 lbs/yr. As shown in attached calculations, no PH3 was detected in leak detection monitoring in 2013. Emissions from GES units were <0.00 lbs/yr and the GETS emissions comprise the 2.61 lbs/yr due to the large volume of gas flow from the treatment system. Calculated emissions for the one IH monitor alarm on 12/11/13 (as reported in Weekly report #175), was 0.00 lb/yr.

#### **MONTHLY (August 2014) DATA REPORTING**

- Attachment 1 – GES Log Sheets - Pond 15S – August 2014
- Attachment 2 – Pond 15S – Calculated Perimeter Pipe Concentration Trend - Current through 8-31-14
- Attachment 3 – Pond 16S GETS Log Sheets – August 2014
- Attachment 4 – Pond 16S – Graphs – Calculated TMP Concentration through 8-6-14
- Attachment 5 – Pond 18A GES Log Sheets - August 2014
- Attachment 6 – Pond 18A – Graphs – Calculated Perimeter Pipe Concentration Trend current and cumulative through 8-31-14
- Attachment 7 – Pond Appurtenance Monitoring - August 2014; Ponds 8E, 9E, 8S, Phase IV, 15S, 16S, 17 and 18A cumulative through 8/31/14
- Attachment 8 – Pond Perimeter Surface Scans – August 2014; all ponds cumulative through 8/31/14
- Attachment 9 – Perimeter Pipe Concentrations - August 2014; Ponds 15S, 16S and 18A cumulative through 8/31/14

During August, FMC contractors KASE/Warbonnet and A&E Engineering personnel logged a total of 1,584 man-hours on site including work associated with implementing the RCRA Pond UAO; no IH personnel monitoring alarm was experienced.